



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date

Time Start 11:20 am

Time Finish 12:35 pm

HAZARDOUS WASTE INSPECTION REPORT



GENERATOR



S Q GENERATOR

Company name B. Braun Medical Inc. I.D. Number PAD 982679169

Site Address 901 Marcon Blvd. Allentown, PA 18109 - 9341

County Lehigh Municipality Hanover Twp. Zip 18109

Name of Inspector Chris Smolar

Name & Title of Responsible Official Steve Stancick Environmental, Health, and Safety Manager

Person Interviewed David Lauer / Joe Patterson Telephone (610) 266-0500 x2584 / x2454

Mailing Address (if different from above) Same

Amount of Hazardous Waste Generated per Month: >2200 Pounds Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other

PBR: ☐ Neutralization/WWTP ☐ Reclaim (silver) Other

GENERATOR TREATMENT ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types Fluorescent Lamps

3. Hazardous Waste Transporters:

Transporter Name Freehold Cartage License Number PA-AH 0067

Transporter Name Dart Trucking License Number PA-AH 0219

Transporter Name Safety Kleen Systems License Number PA-AH 0172

4. Types of hazardous waste generated and destination facility (location & type).

| Waste Code | Waste Description | Destination Facility |
|------------------|---|---------------------------|
| D001, F002, F003 | Waste flammable solids and liquids (solvents) | Environmental Enterprises |
| D001, F002, F003 | Waste flammable solids and liquids (solvents) | Von Roll of America |
| D001, D002, F002 | Lab Wastes | Permafix |
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NERO
BDO
EPA - RCRA
Municipality - Hanover Twp.
Facility - B. Braun Medical

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 12/10/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

REQUIREMENT

PA CIT.
25 PA Code

FED. CIT.
40 CFR

LINE
NO.

| | | | | | | |
|---|---|--|---|------------|---------------------------|------|
| 1 | | | Hazardous waste determination performed on all waste streams | 262a.10 | 262.11 | H001 |
| 1 | | | Identification Number | 262a.10 | 262.12 | H002 |
| 1 | | | Authorized transporters only | 262a.10 | 262.12(c) | H003 |
| 1 | | | Subsequent notification requirements met | 262a.12(b) | | H004 |
| 1 | | | Proper manifest used | 262a.10 | 262.21 | H005 |
| 1 | | | Manifests filled out correctly and completely | 262a.20 | | H006 |
| 1 | | | Manifests signed and routed properly | 262a.23(a) | 262.23 | H007 |
| 1 | | | Generator waste accumulated on site for 90 days or less | 262a.10 | 262.34(a) | H008 |
| | 2 | | SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days | 262a.10 | 262.34(e)(f) | H009 |
| | 2 | | SQG waste accumulated on-site never exceeds 6000 kg | 262a.10 | 262.34(e)(f) | H010 |
| 1 | | | Satellite accumulation requirements complied with | 262a.10 | 262.34(c) | H011 |
| 1 | | | Personnel training program per 265.16 complied with | 262a.10 | 262.34(a)(4) 262.34(d) | H012 |
| 1 | | | Manifest exception and biennial reports retained for 3 years | 262a.10 | 262.40(a)(b) | H013 |
| 1 | | | Specified records retained for three years | 262a.10 | 262.40(c) | H014 |
| 1 | | | Biennial reports submitted to the Department (LQG only) | 262a.41 | 262.41 | H015 |
| 1 | | | Exception reporting procedures followed | 262a.42 | 262.42 | H016 |
| 1 | | | Spill reporting procedures followed | 262a.10 | 262.34(d) | H017 |
| 1 | | | PPC plan developed and implemented | 262a.10 | 262.34(a) | H018 |
| 1 | | | Special requirements followed for international shipments | 262a.10 | 262.50 262.60 | H019 |
| 1 | | | Source reduction strategy prepared and available (LQG only) | 262a.100 | | H020 |
| 1 | | | Excluded waste complies with exclusionary requirements | 261a.4 | 261.4 | H021 |
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COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS – SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name B. Braun Medical, Inc. ID Number PAD 982679169 Date 07/12/02

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS**1 2 3 4****REQUIREMENT****PA CIT.
25 PA Code****FED CIT.
40 CFR****LINE
NO.**

| | | | | | 201A Code | 40 CFR | No. |
|---|--|--|--|--|----------------------------|--------------|------|
| | | | | | CONTAINERS (Subchapter I) | | |
| 1 | | | | Containers managed in compliance with 40 CFR Part 265 Subpart I and 25 PA Code Chapter 265a Subchapter I | 262a.10 | 262.34 | H025 |
| 1 | | | | Containers of hazardous waste in good condition | 265a.1 | 265.171 | H026 |
| 1 | | | | Containers and stored waste compatible | 265a.1 | 265.172 | H027 |
| 1 | | | | Containers kept closed except during addition or removal of wastes | 265a.1 | 265.173(a) | H028 |
| 1 | | | | Containers managed to prevent leaks | 265a.1 | 265.173(b) | H029 |
| 1 | | | | Container configuration and spacing insures safe management and access for inspection purposes and emergency equipment | 265a.173 | | H030 |
| 1 | | | | Container storage areas inspected at least weekly | 265a.1 | 265.174 | H031 |
| 1 | | | | Special requirements for ignitable or reactive and incompatible waste complied with | 265a.1 | 265.176-177 | H032 |
| 1 | | | | Proper containment and collection systems in place | 265a.179 | | H033 |
| 1 | | | | Air emission standards complied with (AA, BB, CC) | 265a.1 | 265.178 | H034 |
| 1 | | | | Containers clearly marked with accumulation date and visible for inspection | 262a.10 | 262.34(a)(2) | H035 |
| 1 | | | | Containers labeled "Hazardous Waste" | 262a.10 | 262.34(a)(3) | H036 |
| 1 | | | | Containers labeled accurately identify contents | SWMA 6018.403(b) (2) | | H037 |

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of inspection December 10, 2002 Identification Number PAD 982679169
Company/Facility/Site Name B. Braun Medical, Inc.

Observations:

I conducted a routine hazardous waste generator inspection on 12/10/02 at B. Braun Medical, Inc. Steve Stancick, David Lauer and Joe Patterson of B. Braun were present during the inspection. The inspection began at 11:20 am.

The facility manufactures medical equipment. The facility generates hazardous and residual wastes during this process. The facility main generates used solvents as hazardous waste. The facility also generates lab waste. The facility's hazardous waste include, but are not limited to, Isopropanol, Methylene Chloride, Ethanol, Butyl Acetate, TCE, and Phenol. The facility generates liquid hazardous waste, and some solid wastes, which mostly include protective equipment.

One containers of hazardous waste was observed in the satellite accumulation area. The drum was properly labeled and had secondary containment. The drum was in good condition. The hazardous waste storage area also had one drum. The drum was properly labeled, had a start date and proper secondary containment. No leaks were observed. No liquid was seen in the secondary containment. The storage area was equipped with fire systems.

One of the lab areas was examined. Lab pack waste is generated here. The facility labels the container and has a log sheet to list whatever is dumped into the lab pack.

The PPC plan was examined. The plan appears to be adequate. Manifests were examined and appear to be in order. The facility just had a pick up on 12/8/02. The training documents were examined. Training for hazardous waste handling was completed in October 2002. The facility's inspection logs were examined and appear to be in order. Some of the facility's waste profiles were examined.

No violations were noted during the inspection.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____
Inspector (signature) _____ Date _____

EVALUATION - VIOLATION - ENFORCEMENT FORM

07/97 VERSION

Handler ID Number:

RCRA Non-Notifier: YES [] NO [X]

PAD 982679169

If YES, the handler section must be completed.

Handler Name:

B. Braun Medical, Inc.

Street:

901 Marcon Blvd

City:

Allentown

State:

PA

Zip Code:

18109

County or County Code:

Lehigh

Contact:

UNIVERSE CHANGE REQUIRED:

YES [] NO [X]

or Indicate Universe Status of the RCRA Non-Notifier:

I. Indicate the facility's current Universe(s):

LQG

III. Indicate the new transporter status:

Transporter []

Non-Transporter []

You must check at least one of the boxes

Check this box if the facility is currently listed in RCRIS as a transporter and no longer transports hazardous waste.

Mark Mode of Transportation

[] Air [] Water
[] Rail [] Other
[] Highway

II. Indicate the new RCRIS Generator Universe:

LQG [] SQG [] CEG []

NON-HANDLER []

CLOSED []

NOTE: All TSD activities changes must be handled by the state data coordinator and cannot be made using this form

EVALUATION:

Add [X]

Change

Delete

Date

Number

Agency

Type

Reason

Branch

Person

12/10/02

...

S

CEI

...

...

P.A.C.S.S.

AREAS OF EVALUATION (E - Evaluated NE - Not Evaluated NA - Not Applicable)

| | | | | | | | |
|---------|---------|---------|---------|---------|---------|---------|---------|
| GGR [E] | GSC [] | TWD [] | DGW [] | DOR [] | DWP [] | BRR [] | FEA [] |
| GLB [E] | GSQ [] | DCH [] | DLB [] | DPB [] | DIN [] | BPS [] | CSS [] |
| GMR [E] | GEX [] | DCL [] | DLF [] | DPP [] | DIA [] | BIS [] | UOR [] |
| GOR [E] | TGR [] | DCP [] | DLT [] | DSI [] | DPS [] | BCE [] | SCC [] |
| GPT [E] | TMR [] | DFR [] | DMC [] | DTR [] | DOP [] | BDT [] | ... |
| GRR [E] | TOR [] | DGS [] | DMR [] | DTT [] | DMI [] | CAS [] | ... |

Comments

OUTSTANDING VIOLATIONS COVERED BY ABOVE EVALUATION

| Agency | Number | Area | Date Determined | Agency | Number | Area | Date Determined |
|--------|--------|------|-----------------|--------|--------|------|-----------------|
| | | | | | | | |
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VIOLATION:

Add

Change

Delete

Link to Above Evaluation: Y/N

Agency

Number

Area

Class

Regulation Type

Regulation Citation

Date Determined

Priority

Branch

Person

Returned to Compliance

Scheduled

Actual

Comments

☐ Required
 ☐ Required if pertinent
 ☐ Required only for previously reported data
 ☐ Not Required by EPA

Handler ID Number

Handler Name

07/97 VERSION

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

☐

Date Determined

Priority

Branch

Person

Returned to Compliance
Scheduled

Actual

Comments

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

☐

Date Determined

Priority

Branch

Person

Returned to Compliance
Scheduled

Actual

Comments

VIOLATION

Add

Change

Delete

Link to Above Evaluation? (Y/N)

Agency

Number

Area

Class

Regulation Type

Regulation Citation

☐

Date Determined

Priority

Branch

Person

Returned to Compliance
Scheduled

Actual

Comments

ENFORCEMENT

Add

Change

Delete

Date

Number

Agency

Type

Branch

Person

Attorney Initials

Docket Number

Penalty Type

Penalty Amount

Multimedia Enforcement Codes
(Place an 'X' next to all that apply)☐ AIR☐ EPCRA☐ FIFRA☐ SPCC☐ TSCA PCB☐ UST☐ UIC☐ WATER☐ WETLANDSNOTE: To record activities for Supplemental
Environmental Projects (SEPs) or to add penalty payment
information, use the Supplemental Enforcement Form.

Comments

VIOLATIONS COVERED BY ABOVE ENFORCEMENT ACTION

Agency

Number

Area

Date Determined

Agency

Number

Area

Date Determined

☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐☐



Pennsylvania Department of Environmental Protection

4530 Bath Pike
Bethlehem, PA 18017
December 13, 2002

Bethlehem District Office

(610) 861-2070
FAX (610) 861-2072

Hanover Township
Municipal Building
2202 Grove Road
Allentown, PA 18109

RE: B. Braun Medical, Inc.
Hanover Township
Lehigh County

Dear Mr. Pudliner:

Please find enclosed a copy of the report of an inspection performed by this District Office at B. Braun Medical, Inc. located in your municipality. A copy of the inspection report is being provided to you pursuant to the provisions of Section 1101(a)(1) of Act 101, the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988.

Sincerely,

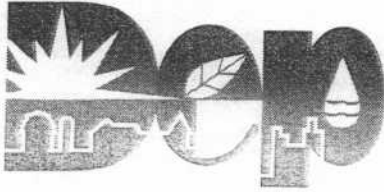
Christopher Smolar

Christopher Smolar
Solid Waste Specialist
Waste Management Program

Enclosure

SP/gh





Pennsylvania Department of Environmental Protection

4530 Bath Pike
Bethlehem, PA 18017
December 13, 2002

Bethlehem District Office

(610) 861-2070
FAX (610) 861-2072

Lower Saucon Township Supervisors
3700 Old Philadelphia Pike
Bethlehem, PA 18015

Attention: Mr. J. Layne Turner

RE: Eastern Waste of Bethlehem, Inc. Landfill
I.D. #100020
Lower Saucon Township
Northampton County

Dear Mr. Turner:

Please find enclosed a copy of the report of an inspection performed by this District Office at the Eastern Waste of Bethlehem, Inc. Landfill, located in your municipality. A copy of the inspection report is being provided to you pursuant to the provisions of Section 1101(a)(1) of Act 101, the Municipal Waste Planning, Recycling and Waste Reduction Act of 1988.

Sincerely,

Christopher Smolar

Christopher Smolar
Waste Management Specialist
Waste Management Program

Enclosure
CS/gh

